

Consumer Economic Loss Class Definitions and Exclusions Table

MANUFACTURER DEFENDANTS

Manufacturer Defendants Express Warranties Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s) ¹
ZHP^2 ,	ZHPTORTEVEW1	All individuals in Alaska; Arizona;	Any judge or magistrate	Charlie Johnston
Torrent ³ ,		California; Colorado; Delaware; D.C.;	presiding over this	(CA); Brian
Teva ⁴		Hawaii; Idaho; Illinois; Indiana; Iowa;	action, and members of	Wineinger (IN);
		Kansas; Maine; Massachusetts;	their families;	Marlin Anderson
		Minnesota Missouri; New Jersey; New		(IL); Jennifer
		Mexico; Oklahoma; Pennsylvania;	Defendants and affiliated	Johnson (MN);
		Puerto Rico; South Dakota; Virginia;	entities, and their	James Childs (NJ);
		Washington; and West Virginia, who,	employees, officers,	Radhakrishna Shetty
		since at least January 1, 2012, and	directors, and agents;	(NJ); Billy Joe
		through the date of final recall (as of		Bruner (NM);
		November 10, 2021), paid any amount	Defendants' legal	Lawrence Semmel
		of money for a valsartan-containing	representatives, assigns,	(PA); Cheryl Mullins
		drug (intended for personal or	and successors; and,	(VA); Mary McLean
		household use) that was manufactured,		(VA)
		distributed, or sold by the ZHP	All persons who properly	
		Defendants, Torrent Defendants, and/or	execute and file a timely	
		Teva Defendants (limited to VCDs	request for exclusion	

¹ These Revised Class Definitions and Exclusions Tables have removed Evelyn Rice (AR), Raleigh Wolfe (IN), and Georgia Fatigato (IL).

² ZHP is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC.

³ Torrent is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Torrent Pharmaceuticals Ltd.; and Torrent Pharma Inc.

⁴ Teva is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC.

		manufactured using ZHP Defendants'	from any Court-approved	
		API).	class.	
ZHP, Torrent, Teva	ZHPTORTEVEW2	All individuals in Alabama; Arkansas; Florida; Georgia; Mississippi Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; Ohio; Oregon; Rhode Island; South Carolina; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using	Id.	Sandra Kelly (AL); Ron Molinaro (FL); Dennis Kaplan (OH); Lubertha Powell (GA); Flora McGilvery (MS); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Eric Erwin (TX); Samuel Cisneros (TX); Jynona Gail Lee (TX)
ZHP, Torrent, Teva	ZHPTORTEVEW3	ZHP Defendants' API). All individuals in Connecticut; Kentucky; North Dakota who, since at least January 1, 2012, and through the	Id.	Glenda Cooper (KY)
		date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		

Consumer Economic Loss Class Definitions and Exclusions Table

Mylon ⁵ Toyro	MYLTEVEW1	All individuals in Alaska, California	Any judge or megistrate	Marzanna Clah (NI): Jamas
Mylan ⁵ , Teva	MILLEVEWI	All individuals in Alaska; California;	Any judge or magistrate	Marzanna Glab (NJ); James
		Delaware; D.C.; Hawaii; Idaho; Illinois;	presiding over this	Lawson (NJ); James Childs (NJ);
		Indiana; Iowa; Kansas; Maine;	action, and members of	Mary McLean (VA); Jay Meader
		Massachusetts; Minnesota; Missouri;	their families;	(CA); Mark Hays (CA); Robin
		New Jersey; New Mexico; Oklahoma;		Roberts (VA)
		Pennsylvania; Puerto Rico; South	Defendants and affiliated	
		Dakota; Virginia; Washington; and	entities, and their	
		West Virginia, who, since at least	employees, officers,	
		January 1, 2012, and through the date of	directors, and agents;	
		final recall (as of November 10, 2021),	_	
		paid any amount of money for a	Defendants' legal	
		valsartan-containing drug (intended for	representatives, assigns,	
		personal or household use) that was	and successors; and,	
		manufactured, distributed, or sold by	, ,	
		the Mylan Defendants and/or Teva	All persons who properly	
		Defendants (limited to VCDs	execute and file a timely	
		manufactured using Mylan Defendants'	request for exclusion	
		API).	from any Court-approved	
		7 H 1).	class.	
Mylan, Teva	MYLTEVEW2	All individuals in Alabama; Arkansas;	Id.	Asha Lamy (AL); Lawrence
ivijian, ieva	MILLIEVEVIZ	Florida; Georgia; Mississippi Montana;	10.	Edwards (GA); Joseph Cacaccio
		Nebraska; Nevada; New Hampshire;		(NY); Gerald Nelson (NY); Eric
		New York; North Carolina; Ohio;		Erwin (TX); Brittney Means
		Oregon; Rhode Island; South Carolina;		(TX)
		Texas; Utah; Vermont; Wisconsin; and		(IX)
		Wyoming, who, since at least January 1,		
		2012, and through the date of final		
		recall (as of November 10, 2021), paid		
		any amount of money for a valsartan-		
1		containing drug (intended for personal		

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⁵ Mylan is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan Pharmaceuticals, Inc.

Consumer Economic Loss Class Definitions and Exclusions Table

		or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVEW3	All individuals in Connecticut; Kentucky; North Dakota, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Glenda Cooper (KY)
Hetero ⁶	HETEW1	All individuals in Alaska; California; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and West Virginia, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents;	Veronica Longwell (MA); James Childs (NJ); Mark Hays (CA); Leland Gildner (IN)

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⁶ Hetero is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; and, Camber Pharmaceuticals, Inc.

		or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Hetero	HETEW3	All individuals in Connecticut; Kentucky; North Dakota; who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Id.	Peter O'Brien (CT)
Aurobindo ⁷	AUREW1	All individuals in Alaska; California; Delaware; D.C.; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; South Dakota; Virginia; Washington; and, West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021),	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents;	Marlin Anderson (IL); Joseph Kessinger (KS); Estate of Linda Crocker (ME); Veronica Longwell (MA); Jennifer Johnson (MN); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Mark Hays (CA); Merilyn Andre (CA);

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⁷ Aurobindo is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; Aurolife Pharma, LLC

		paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Aurobindo	AUREW2	All individuals in Alabama; Arkansas; Florida; Georgia; Mississippi Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; Ohio; Oregon; Rhode Island; South Carolina; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Estate of Elenora Deutenberg/Feijoo (FL); Dennis Kaplan (OH); Lawrence Edwards (GA); Joseph Cacaccio (NY); Gerald Nelson (NY); Eric Erwin (TX)

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Manufacturer Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVIW1	All individuals in Alaska; California;	Any judge or magistrate	Charlie Johnston (CA); James
Torrent,		Colorado; Delaware; D.C.; Hawaii;	presiding over this action, and	Childs (NJ); Cheryl Mullins
Teva		Indiana; Iowa; Maine; Massachusetts;	members of their families;	(VA); Radhakrishna Shetty
		New Jersey; New Mexico; Oklahoma;		(NJ); Billy Joe Bruner (NM);
		Puerto Rico; Rhode Island; South	Defendants and affiliated	Brian Wineinger (IN); Mary
		Dakota; Virginia; and West Virginia,	entities, and their employees,	McLean (VA)
		who, since at least January 1, 2012,	officers, directors, and agents;	
		and through the date of final recall (as		
		of November 10, 2021), paid any	Defendants' legal	
		amount of money for a valsartan-	representatives, assigns, and	
		containing drug (intended for personal	successors; and,	
		or household use) that was		
		manufactured, distributed, or sold by	All persons who properly	
		the ZHP Defendants, Torrent	execute and file a timely request	
		Defendants, and/or Teva Defendants	for exclusion from any Court-	
		(limited to VCDs manufactured using	approved class.	
ZUD	ZUDTODTEVIVO	ZHP Defendants' API).	1.1	Last and a Dassell (CA):
ZHP,	ZHPTORTEVIW2	All individuals in Arkansas; Georgia;	Id.	Lubertha Powell (GA);
Torrent,		Maryland; Michigan; Minnesota;		Jennifer Johnson (MN); Flora
Teva		Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire;		McGilvery (MS); Eric Erwin (TX); Jynona Gail Lee (TX);
		North Dakota; South Carolina; Texas;		Samuel Cisneros (TX)
		and Wyoming, who, since at least		Samuel Cisheros (174)
		January 1, 2012, and through the date		
		of final recall (as of November 10,		
		2021), paid any amount of money for a		
		valsartan-containing drug (intended for		
		personal or household use) that was		
		manufactured, distributed, or sold by		
		the ZHP Defendants, Torrent		

		Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Kansas; Kentucky; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Ron Molinaro (FL); Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL); Gary Burnett (NC); Miranda Dudley (NC)
ZHP, Torrent, Teva	ZHPTORTEVIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Sandra Kelly (AL); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Dennis Kaplan (OH)
ZHP, Torrent,	ZHPTORTEVIW5	All individuals in Louisiana, who, since at least January 1, 2012, and	Id.	Talsie Neal (LA)
Teva		through the date of final recall (as of		

Mylan, Teva	MYLTEVIW1	November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API). All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Courtapproved class.	Jay Meader (CA); Mark Hays (CA); Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Robin Roberts (VA)
Mylan, Teva	MYLTEVIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Minnesota; Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Carolina; Texas; and Wyoming, who, since at least January 1, 2012, and through the date	Id.	Lawrence Edwards (GA); Mary McLean (VA); Eric Erwin (TX); Brittney Means (TX)

		of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan		
		Defendants' API).		
Mylan, Teva	MYLTEVIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Asha Lamy (AL); Joseph Caccaccio (NY); Gerald Nelson (NY)
Hetero	HETIW1	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Iowa; Maine; Massachusetts; New Jersey; New Mexico; Oklahoma; Puerto Rico; Rhode Island; South Dakota; Virginia; and West Virginia, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and,	Mark Hays (CA); James Childs (NJ); Leland Gildner (IN); Veronica Longwell (MA)

		household use) that was manufactured,		
		distributed, or sold by the Hetero	All persons who properly	
		Defendants (limited to VCDs	execute and file a timely request	
		manufactured using Hetero	for exclusion from any Court-	
		Defendants' API).	approved class.	
Hetero	HETIW3	All individuals in Arizona;	Id.	Peter O'Brien (CT)
		Connecticut; Florida; Idaho; Illinois;		
		Kansas; Kentucky; North Carolina;		
		Washington, who, since at least May 1,		
		2018, and through the date of final		
		recall (as of November 10, 2021), paid		
		any amount of money for a valsartan-		
		containing drug (intended for personal		
		or household use) that was		
		manufactured, distributed, or sold by		
		the Hetero Defendants (limited to		
		VCDs manufactured using Hetero		
		Defendants' API).		
Aurobindo	AURIW1	All individuals in Alaska; California;	Any judge or magistrate	Mark Hays (CA); Merilyn
		Colorado; Delaware; D.C.; Hawaii;	presiding over this action, and	Andre (CA); Marzanna Glab
		Indiana; Iowa; Maine; Massachusetts;	members of their families;	(NJ); Antoinette Sims (NJ);
		New Jersey; New Mexico; Oklahoma;		James Lawson (NJ); James
		Puerto Rico; Rhode Island; South	Defendants and affiliated	Childs (NJ); Estate of Linda
		Dakota; Virginia; and West Virginia,	entities, and their employees,	Crocker/Davis (ME); Veronica
		who, since at least January 1, 2012,	officers, directors, and agents;	Longwell (MA);
		and through the date of final recall (as		
		of November 10, 2021), paid any	Defendants' legal	
		amount of money for a valsartan-	representatives, assigns, and	
		containing drug (intended for personal	successors; and,	
		or household use) that was		
		manufactured, distributed, or sold by	All persons who properly	
		the Aurobindo Defendants (limited to	execute and file a timely request	

		VCDs manufactured using Aurobindo Defendants' API).	for exclusion from any Courtapproved class.	
Aurobindo	AURIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Minnesota; Mississippi; Missouri; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Carolina; Texas; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Lawrence Edwards (GA); Jennifer Johnson (MN); Eric Erwin (TX)
Aurobindo	AURIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Kansas; Kentucky; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Estate of Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL);
Aurobindo	AURIW4	All individuals in Alabama; New York; Ohio; Oregon; Tennessee; Utah; Vermont; and Wisconsin, who, since at	Id.	Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

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		least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).		
Aurobindo	AURIW5	All individuals in Louisiana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Sandy Bell (LA)

Manufacturer Defendants Common Law Fraud Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVFR1	All individuals in California;	Any judge or magistrate presiding	Charlie Johnston (CA);
Torrent,		Connecticut; Delaware;	over this action, and members of	Lubertha Powell (GA); Brian
Teva		Georgia; Indiana; Kansas;	their families;	Wineinger (IN); Glenda
		Kentucky; Maine; Maryland;		Cooper (KY); Billy Joe Bruner
		Michigan; Nebraska; New	Defendants and affiliated entities,	(NM); Lawrence Semmel
		Hampshire; New Mexico;	and their employees, officers,	(PA); Eric Erwin (TX); Jynona
		Pennsylvania; South Carolina;	directors, and agents;	Gail Lee (TX); Samuel
		Tennessee; Texas; Utah; West		Cisneros (TX)
		Virginia; and Wisconsin, who,	Defendants' legal representatives,	
		since at least January 1, 2012,	assigns, and successors; and,	
		and through the date of final		
		recall (as of November 10,	All persons who properly execute	
		2021), paid any amount of	and file a timely request for	
		money for a valsartan-	exclusion from any Court-approved	
		containing drug (intended for	class.	
		personal or household use) that		
		was manufactured, distributed,		
		or sold by the ZHP Defendants,		
		Torrent Defendants, and/or		
		Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
ZHP,	ZHPTORTEVFR2	All individuals in Alabama;	Id.	Sandra Kelly (AL); Marlin
Torrent,		Arizona; Hawaii; Illinois;		Anderson (IL); Flora
Teva		Mississippi; Missouri;		McGilvery (MS)
		Montana; Nevada; and Oregon,		
		who, since at least January 1,		
		2012, and through the date of		
		final recall (as of November 10,		
		2021), paid any amount of		

		money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was manufactured, distributed,		
		or sold by the ZHP Defendants,		
		Torrent Defendants, and/or		
		Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
ZHP,	ZHPTORTEVFR3	All individuals in Alaska;	Id.	Ron Molinaro (FL); Talsie
Torrent,		Arkansas; Colorado; D.C.;		Neal (LA); Jennifer Johnson
Teva		Florida; Idaho; Iowa;		(MN); James Childs (NJ);
		Louisiana; Massachusetts;		Radhakrishna Shetty (NJ);
		Minnesota; New Jersey; New		Alphonse Borkowski (NY);
		York; North Carolina; North		Joseph Cacaccio (NY); John
		Dakota; Ohio; Oklahoma;		Duffy (NY); Gerald Nelson
		Rhode Island; South Dakota;		(NY); Gary Burnett (NC);
		Vermont; Virginia;		Miranda Dudley (NC); Dennis
		Washington; Wyoming; and		Kaplan (OH); Cheryl Mullins
		Puerto Rico, who, since at least		(VA); Mary McLean (VA)
		January 1, 2012, and through		
		the date of final recall (as of		
		November 10, 2021), paid any		
		amount of money for a		
		valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		manufactured, distributed, or		
		sold by the ZHP Defendants,		
		Torrent Defendants, and/or		
		Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		

Mylan, Teva	MYLTEVFR1	All individuals in California;	Any judge or magistrate presiding	Jay Meader (CA); Mark Hays
1,11 ian, 10 ia	TVI I I I I I I I I I I I I I I I I I I	Connecticut; Delaware;	over this action, and members of	(CA); Lawrence Edwards
		Georgia; Indiana; Kansas;	their families;	(GA); Glenda Cooper (KY);
		Kentucky; Maine; Maryland;	then rainines,	Eric Erwin (TX); Brittney
		Michigan; Nebraska; New	Defendants and affiliated entities,	Means (TX)
		Hampshire; New Mexico;	and their employees, officers,	1.104113 (111)
		Pennsylvania; South Carolina;	directors, and agents;	
		Tennessee; Texas; Utah; West	directors, and agents,	
		Virginia; and Wisconsin, who,	Defendants' legal representatives,	
		since at least January 1, 2012,	assigns, and successors; and,	
		and through the date of final	<i>g</i>	
		recall (as of November 10,	All persons who properly execute	
		2021), paid any amount of	and file a timely request for	
		money for a valsartan-	exclusion from any Court-approved	
		containing drug (intended for	class.	
		personal or household use) that		
		was manufactured, distributed,		
		or sold by the Mylan		
		Defendants and/or Teva		
		Defendants (limited to VCDs		
		manufactured using Mylan		
		Defendants' API).		
Mylan, Teva	MYLTEVFR2	All individuals in Alabama;	Id.	Asha Lamy (AL)
		Arizona; Hawaii; Illinois;		
		Mississippi; Missouri;		
		Montana; Nevada; and		
		Oregon, who, since at least		
		January 1, 2012, and through		
		the date of final recall (as of		
		November 10, 2021), paid any		
		amount of money for a		
		valsartan-containing drug		
		(intended for personal or		

		household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVFR3	All individuals in Alaska; Arkansas; Colorado; D.C.; Florida; Idaho Iowa; Louisiana; Massachusetts; Minnesota; New Jersey; New York; North Carolina; North Dakota; Ohio; Oklahoma; Rhode Island; South Dakota; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Joseph Cacaccio (NY); Gerald Nelson (NY); Mary McLean (VA); Robin Roberts (VA)
Hetero	HETFR1	All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland;	Any judge or magistrate presiding over this action, and members of their families;	Mark Hays (CA); Peter O'Brien (CT); Leland Gildner (IN);

		Michigan; Nebraska; New	Defendants and affiliated entities,	
		Hampshire; New Mexico;	and their employees, officers,	
			1	
		Pennsylvania; South Carolina;	directors, and agents;	
		Tennessee; Texas; Utah; West	D-C1	
		Virginia; and Wisconsin, who,	Defendants' legal representatives,	
		since at least May 1, 2018, and	assigns, and successors; and,	
		through the date of final recall		
		(as of November 10, 2021),	All persons who properly execute	
		paid any amount of money for	and file a timely request for	
		a valsartan-containing drug	exclusion from any Court-approved	
		(intended for personal or	class.	
		household use) that was		
		manufactured, distributed, or		
		sold by the Hetero Defendants		
		(limited to VCDs manufactured		
		using Hetero Defendants' API).		
Hetero	HETFR3	All individuals in Alaska;	Id.	James Childs (NJ); Veronica
		Arkansas; Colorado; D.C.;		Longwell (MA)
		Florida; Idaho; Iowa;		
		Louisiana; Massachusetts;		
		Minnesota; New Jersey; New		
		York; North Carolina; North		
		Dakota; Ohio; Oklahoma;		
		Rhode Island; South Dakota;		
		Vermont; Virginia;		
		Washington; Wyoming; and		
		Puerto Rico, who, since at least		
		May 1, 2018, and to the date of		
		final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended for		
I		personal or household use) that		

		was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Aurobindo	AURFR1	All individuals in California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Michigan; Nebraska; New Hampshire; New Mexico; Pennsylvania; South Carolina; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Mark Hays (CA); Merilyn Andre (CA); Lawrence Edwards (GA); Joseph Kessinger (KS); Eric Erwin (TX); Estate of Linda Crocker (ME);
Aurobindo	AURFR2	All individuals in Alabama; Arizona; Hawaii; Illinois; Mississippi; Missouri; Montana; Nevada; and Oregon, who, since at least January 1, 2012, and through the date of final recall (as of November 10,	Id.	Marlin Anderson (IL);

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		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was manufactured, distributed,		
		or sold by the Aurobindo		
		Defendants (limited to VCDs		
		manufactured using Aurobindo		
		Defendants' API).		
Aurobindo	AURFR3	All individuals in Alaska;	Id.	Estate of Elenora
		Arkansas; Colorado; D.C.;		Deutenberg/Feijoo (FL);
		Florida; Idaho; Iowa;		Sandy Bell (LA); Veronica
		Louisiana; Massachusetts;		Longwell (MA); Jennifer
		Minnesota; New Jersey; New		Johnson (MN); Marzanna Glab
		York; North Carolina; North		(NJ); Antoinette Sims (NJ);
		Dakota; Ohio; Oklahoma;		James Lawson (NJ); Joseph
		Rhode Island; South Dakota;		Cacaccio (NY); Gerald Nelson
		Vermont; Virginia;		(NY); Dennis Kaplan (OH)
		Washington; Wyoming; and		1 ,
		Puerto Rico, who, since at least		
		January 1, 2012, and through		
		the date of final recall (as of		
		November 10, 2021), paid any		
		amount of money for a		
		valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		manufactured, distributed, or		
		sold by the Aurobindo		
		Defendants (limited to VCDs		
		manufactured using Aurobindo		
		Defendants' API).		

Manufacturer Defendants Consumer Protection Act Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVCPA1	All individuals in Alaska;	Any judge or magistrate	Charlie Johnston (CA); Ron
Torrent,		Arizona; California (§	presiding over this action, and	Molinaro (FL); Estate of Elenora
Teva		17200 UCL only);	members of their families;	Deutenberg/Feijoo (FL); Talsie Neal
		Connecticut; D.C.;		(LA); Alphonse Borkowski (NY);
		Florida; Hawaii; Idaho;	Defendants and affiliated	Joseph Cacaccio (NY); John Duffy
		Louisiana; Maryland;	entities, and their employees,	(NY); Gerald Nelson (NY); Gary
		Missouri; Montana;	officers, directors, and agents;	Burnett (NC); Miranda Dudley
		Nebraska; New		(NC); Dennis Kaplan (OH);
		Hampshire; New York;	Defendants' legal	Lawrence Semmel (PA)
		North Carolina; North	representatives, assigns, and	
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;		
		Vermont; and	All persons who properly	
		Washington, who, since at	execute and file a timely request	
		least January 1, 2012, and	for exclusion from any Court-	
		through the date of final	approved class.	
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the ZHP		
		Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		

		VCDs manufactured using		
	GIIDEO DE ELICO A A	ZHP Defendants' API).	7.1	7 7.1 200 7
ZHP,	ZHPTORTEVCPA2	All individuals in	Id.	Jennifer Johnson (MN); James
Torrent,		Delaware; Minnesota;		Childs (NJ); Radhakrishna Shetty
Teva		New Jersey; and		(NJ)
		Wisconsin, who, since at		
		least January 1, 2012, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the ZHP		
		Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
ZHP,	ZHPTORTEVCPA3	All individuals in Maine;	Id.	Eric Erwin (TX); Brittney Means
Torrent,		Massachusetts; and Texas,		(TX); Samuel Cisneros (TX); Jynona
Teva		who, since at least January		Gail Lee (TX)
		1, 2012, and through the		
		date of final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		

		ZHP Defendants, Torrent		
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		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
ZHP,	ZHPTORTEVCPA4	All individuals in	Id.	Marlin Anderson (IL); Glenda
Torrent,		Colorado; Illinois;		Cooper (KY); Billy Joe Bruner
Teva		Kentucky; Nevada; New		(NM); Cheryl Mullins (VA); Robin
		Mexico; South Dakota;		Roberts (VA); Mary McLean (VA)
		Utah; and Virginia, who,		
		since at least January 1,		
		2012, and through the date		
		of final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		ZHP Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
ZHP,	ZHPTORTEVCPA5	All individuals in Indiana;	Id.	Brian Wineinger (IN);
Torrent,		and Wyoming, who, since		
Teva		at least January 1, 2012,		
10,4		and through the date of		
		final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		•		
		a valsartan-containing		

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		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		ZHP Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
Mylan, Teva	MYLTEVCPA1	All individuals in Alaska;	Any judge or magistrate	Jay Meader (CA); Mark Hays (CA);
		Arizona; California (§	presiding over this action, and	Peter O'Brien (CT); Joseph Cacaccio
		17200 UCL only);	members of their families;	(NY); Gerald Nelson (NY)
		Connecticut; D.C.;		
		Florida; Hawaii; Idaho;	Defendants and affiliated	
		Louisiana; Maryland;	entities, and their employees,	
		Missouri; Montana;	officers, directors, and agents;	
		Nebraska; New		
		Hampshire; New York;	Defendants' legal	
		North Carolina; North	representatives, assigns, and	
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;	,	
		Vermont; and	All persons who properly	
		Washington, who, since at	execute and file a timely request	
		least January 1, 2012, and	for exclusion from any Court-	
		through the date of final	approved class.	
		recall (as of November 10,	Tr	
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the Mylan		

		Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ);
Mylan, Teva	MYLTEVCPA3	Mylan Defendants' API). All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured,	Id.	Eric Erwin (TX); Brittney Means (TX);

		distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA4	All individuals in Colorado; Illinois; Kentucky; Nevada; New Mexico; South Dakota; Utah; and Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Glenda Cooper (KY); Mary McLean (VA); Robin Roberts (VA);
Mylan, Teva	MYLTEVCPA5	All individuals in Indiana; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for	Id.	Leland Gildner (IN)

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		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		Mylan Defendants and/or		
		Teva Defendants (limited		
		to VCDs manufactured		
		using Mylan Defendants'		
		API).		
Hetero	HETCPA1	All individuals in Alaska;	Any judge or magistrate	Mark Hays (CA); Peter O'Brien
		Arizona; California (§	presiding over this action, and	(CT);
		17200 UCL only);	members of their families;	
		Connecticut; D.C.;		
		Florida; Hawaii; Idaho;	Defendants and affiliated	
		Louisiana; Maryland;	entities, and their employees,	
		Missouri; Montana;	officers, directors, and agents;	
		Nebraska; New		
		Hampshire; New York;	Defendants' legal	
		North Carolina; North	representatives, assigns, and	
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;	, ,	
		Vermont; and	All persons who properly	
		Washington, who, since at	execute and file a timely request	
		least May 1, 2018, and	for exclusion from any Court-	
		through the date of final	approved class.	
		recall (as of November 10,	Tr	
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		

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		or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Hetero	HETCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Id.	James Childs (NJ)
Hetero	HETCPA5	All individuals in Indiana; and Wyoming, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero	Id.	Leland Gildner (IN)

Aurobindo	ALIDCDA 1	Defendants (limited to VCDs manufactured using Hetero Defendants' API).	Any judge or magistrate	Mark Hays (CA): Marilyn Andra
Aurobindo	AURCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; and, All persons who properly execute and file a timely request for exclusion from any Courtapproved class.	Mark Hays (CA); Merilyn Andre (CA); Estate of Elenora Deutenberg/Feijoo (FL); Sandy Bell (LA); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)
Aurobindo	AURCPA2	All individuals in Delaware; Minnesota;	Id.	Jennifer Johnson (MN); Marzanna Glab (NJ); Antoinette Sims (NJ);

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		New Jersey; and		James Lawson (NJ); James Childs
		Wisconsin, who, since at		(NJ)
		least January 1, 2012, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the Aurobindo		
		Defendants (limited to		
		VCDs manufactured using		
		Aurobindo Defendants'		
		API).		
Aurobindo	AURCPA3	All individuals in Maine;	Id.	Estate of Linda Crocker (ME);
		Massachusetts; and Texas,		Veronica Longwell (MA); Eric
		who, since at least January		Erwin (TX)
		1, 2012, and through the		, ,
		date of final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		Aurobindo Defendants		
		(limited to VCDs		
		manufactured using		
		Aurobindo Defendants'		
		API).		

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Aurobindo	AURCPA4	All individuals in	Id.	Marlin Anderson (IL);
		Colorado; Illinois;		
		Kentucky; Nevada; New		
		Mexico; South Dakota;		
		Utah; and Virginia, who,		
		since at least January 1,		
		2012, and through the date		
		of final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		Aurobindo Defendants		
		(limited to VCDs		
		manufactured using		
		Aurobindo Defendants'		
		API).		

RETAIL PHARMACY DEFENDANTS

Retail Pharmacy Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Defendant(s) Walgreens	WALIW1	Definition All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Exclusion(s) Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved	Class Representative(s) Billy Joe Bruner (NM)
CVS	CVSIW1	All individuals in Alaska;	class. Any judge or magistrate presiding	Lawrence Semmel (PA)
		Colorado; Delaware; District of Columbia; Hawaii; Indiana; New	over this action, and members of their families;	

		Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by CVS prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved	
Walmart	WMTIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended	class. Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartancontaining drug purchases (intended	Brian Wineinger (IN)

		for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walmart (including Sam's Club locations) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Kroger	KROIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Kroger prior to May 1, 2018;	Leland Gildner (IN)

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of the Manufacturer Defendants.	All persons who properly execute and file a timely request for exclusion from any Court-approved	
	class.	

Retail Pharmacy Defendants' Consumer Protection Claim:

* Rite Aid is a pharmacy defendant but has declared bankruptcy and therefore all claims against Rite Aid are subject to an automatic stay. For more information on Rite Aid's bankruptcy, see https://restructuring.ra.kroll.com/RiteAid.

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
CVS	CVSCPA1	All individuals in Alaska;	Any judge or magistrate	Jay Meader (CA); Mark Hays
Consumer		Arizona; California (§ 17200	presiding over this action, and	(CA); Peter O'Brien (CT); Ron
Protection		UCL only); Connecticut; D.C.;	members of their families;	Molinaro (FL); Estate of Elenora
Act State		Florida; Hawaii; Idaho;		Deutenberg/Feijoo (FL); Sandy
Grouping		Louisiana; Maryland; Missouri;	Defendants and affiliated	Bell (LA); Lawrence Semmel (PA)
No. 1		Montana; Nebraska; New	entities, and their employees,	
		Hampshire; New York; North	officers, directors, and agents;	
		Carolina; North Dakota; Ohio;		
		Oklahoma; Oregon;	Defendants' legal	
		Pennsylvania; Vermont;	representatives, assigns, and	
		Washington, who, since at least	successors;	
		January 1, 2012, and through the		
		date of final recall (as of	Individuals whose only	
		November 10, 2021), paid any	valsartan-containing drug	
		amount of money for a valsartan-	purchases (intended for	
		containing drug (intended for	personal or household use),	
		personal or household use) that	who would otherwise meet this	
		was dispensed by Defendant	Class Definition, were Hetero	
		CVS Pharmacy, Inc. (including	Defendants' valsartan-	
		Target locations), and	containing drugs dispensed by	
		manufactured, distributed, or	CVS prior to May 1, 2018;	
		sold by any of the Manufacturer		
		Defendants.	All persons who properly	
			execute and file a timely	
			request for exclusion from any	
			Court-approved class.	

CVS	CVSCPA2	All individuals in Delaware;	Id.	Marzanna Glab (NJ); James
Consumer	0,201112	Minnesota; New Jersey; and	Tu.	Lawson (NJ)
Protection		Wisconsin, who, since at least		
Act State		January 1, 2012, and through the		
Grouping		date of final recall (as of		
No. 2		November 10, 2021), paid any		
		amount of money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was dispensed by Defendant		
		CVS Pharmacy, Inc. (including		
		Target locations), and		
		manufactured, distributed, or		
		sold by any of the Manufacturer		
		Defendants.		
CVS	CVSCPA3	All individuals in Maine;	Id.	Veronica Longwell (MA); Brittney
Consumer		Massachusetts; and Texas, who,		Means (TX)
Protection		since at least January 1, 2012,		
Act State		and through the date of final		
Grouping		recall (as of November 10,		
No. 3		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant CVS		
		Pharmacy, Inc. (including Target		
		locations), and manufactured,		
		distributed, or sold by any of the		
*** 1	THAT CDA 1	Manufacturer Defendants.		D. C. C.
Walgreens	WALCPA1	All individuals in Alaska;	Any judge or magistrate	Estate of Elenora
Consumer		Arizona; California (§ 17200	presiding over this action, and	Deutenberg/Feijoo (FL); John
Protection		UCL only); Connecticut; D.C.;	members of their families;	Duffy (NY)
Act State		Florida; Hawaii; Idaho;		

Grouping		Louisiana; Maryland; Missouri;	Defendants and affiliated	
No. 1		Montana; Nebraska; New	entities, and their employees,	
		Hampshire; New York; North	officers, directors, and agents;	
		Carolina; North Dakota; Ohio;		
		Oklahoma; Oregon;	Defendants' legal	
		Pennsylvania; Vermont and	representatives, assigns, and	
		Washington, who, since at least	successors;	
		January 1, 2012, and through the		
		date of final recall (as of	Individuals whose only	
		November 10, 2021), paid any	valsartan-containing drug	
		amount of money for a valsartan-	purchases (intended for	
		containing drug (intended for	personal or household use),	
		personal or household use) that	who would otherwise meet this	
		was dispensed by Defendant	Class Definition, were Hetero	
		Walgreens Co., and	Defendants' valsartan-	
		manufactured, distributed, or	containing drugs dispensed by	
		sold by any of the Manufacturer Defendants.	Walgreens prior to May 1,	
		Defendants.	2018;	
			All persons who properly	
			execute and file a timely	
			request for exclusion from any	
			Court-approved class.	
Walgreens	WALCPA2	All individuals in Delaware;	Id.	Radhakrishna Shetty (NJ)
Consumer		Minnesota; New Jersey; and		3 \ /
Protection		Wisconsin, who, since at least		
Act State		January 1, 2012, and through the		
Grouping		date of final recall (as of		
No. 2		November 10, 2021), paid any		
		amount of money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was dispensed by Defendant		

		Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walgreens Consumer Protection Act State Grouping No. 3	WALCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Eric Erwin (TX); Brittney Means (TX)
Rite-Aid* Consumer Protection Act State Grouping No. 1	RITCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for	Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

		containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation*, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan- containing drugs dispensed by Rite-Aid* prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart	WMTCPA1	All individuals in Alaska;	Any judge or magistrate	Talsie Neal (LA); Gary Burnett
Consumer	***************************************	Arizona; California (§ 17200	presiding over this action, and	(NC)
Protection		UCL only); Connecticut; D.C.;	members of their families;	
Act State		Florida; Hawaii; Idaho;	members of their runnies,	
Grouping		Louisiana; Maryland; Missouri;	Defendants and affiliated	
No. 1		Montana; Nebraska; New	entities, and their employees,	
		Hampshire; New York; North	officers, directors, and agents;	
		Carolina; North Dakota; Ohio;	, , ,	
		Oklahoma; Oregon;	Defendants' legal	
		Pennsylvania; Vermont and	representatives, assigns, and	
		Washington, who, since at least	successors;	
		January 1, 2012, and through the		
		date of final recall (as of	Individuals whose only	
		November 10, 2021), paid any	valsartan-containing drug	
		amount of money for a valsartan-	purchases (intended for	
		containing drug (intended for	personal or household use),	
		personal or household use) that	who would otherwise meet this	
		was dispensed by Defendant	Class Definition, were Hetero	
		Walmart Stores, Inc. (including	Defendants' valsartan-	
		Sam's Club locations), and	containing drugs dispensed by	

		manufactured, distributed, or sold by any of the Manufacturer Defendants.	Walmart (including Sam's Club locations) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart Consumer Protection Act State Grouping No. 2	WMTCPA2	All individuals in Delaware; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Walmart Consumer Protection Act State Grouping No. 3	WMTCPA3	All individuals in Maine; Massachusetts; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was	Id.	Jynona Gail Lee (TX); Samuel Cisneros (TX)

		dispensed by Defendant Walmart Stores, Inc. (including Sam's		
		Club locations), and		
		manufactured, distributed, or		
		sold by any of the Manufacturer		
		Defendants.		
Express	ESICPA1	All individuals in Alaska;	Any judge or magistrate	Mark Hays (CA); Merilyn Andre
Scripts		Arizona; California (§ 17200	presiding over this action, and	(CA)
Consumer		UCL only); Connecticut; D.C.;	members of their families;	
Protection		Florida; Hawaii; Idaho;		
Act State		Louisiana; Maryland; Missouri;	Defendants and affiliated	
Grouping		Montana; Nebraska; New	entities, and their employees,	
No. 1		Hampshire; New York; North	officers, directors, and agents;	
		Carolina; North Dakota; Ohio;		
		Oklahoma; Oregon;	Defendants' legal	
		Pennsylvania; Vermont and	representatives, assigns, and	
		Washington, who, since at least January 1, 2012, and through the	successors;	
		date of final recall (as of	Individuals whose only	
		November 10, 2021), paid any	valsartan-containing drug	
		amount of money for a valsartan-	purchases (intended for	
		containing drug (intended for	personal or household use),	
		personal or household use) that	who would otherwise meet this	
		was dispensed by Defendant	Class Definition, were Hetero	
		Express Scripts, Inc., and	Defendants' valsartan-	
		manufactured, distributed, or	containing drugs dispensed by	
		sold by any of the Manufacturer	Express Scripts prior to May 1,	
		Defendants.	2018;	
			,	
			All persons who properly	
			execute and file a timely	
			request for exclusion from any	
			Court-approved class.	

OptumRx Consumer Protection Act State Grouping No. 1	OPTCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Vermont and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by OptumRx prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any	Charlie Johnston (CA)
			Court-approved class.	
Albertson's Consumer Protection Act State	ALBCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho;	Any judge or magistrate presiding over this action, and members of their families;	Merilyn Andre (CA)

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Grouping	Louisiana; Maryland; Missouri;	Defendants and affiliated
No. 1	Montana; Nebraska; New	entities, and their employees,
	Hampshire; New York; North	officers, directors, and agents;
	Carolina; North Dakota; Ohio;	
	Oklahoma; Oregon;	Defendants' legal
	Pennsylvania; Vermont and	representatives, assigns, and
	Washington, who, since at least	successors;
	January 1, 2012, and through the	
	date of final recall (as of	Individuals whose only
	November 10, 2021), paid any	valsartan-containing drug
	amount of money for a valsartan-	purchases (intended for
	containing drug (intended for	personal or household use),
	personal or household use) that	who would otherwise meet this
	was dispensed by Defendant	Class Definition, were Hetero
	Albertson's LLC (including Sav-	Defendants' valsartan-
	On), and manufactured,	containing drugs dispensed by
	distributed, or sold by any of the	Albertson's (including Sav-
	Manufacturer Defendants.	On) prior to May 1, 2018;
		All persons who properly
		execute and file a timely
		request for exclusion from any
		Court-approved class.

Retail Pharmacy Defendants' Unjust Enrichment Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
CVS Unjust	CVSUE1	All individuals in Texas, who,	Any judge or magistrate	Brittney Means (TX)
Enrichment		since at least January 1, 2012,	presiding over this action, and	
Grouping		and through the date of final	members of their families;	
No. 1		recall (as of November 10,		
		2021), paid any amount of	Defendants and affiliated	
		money for a valsartan-containing	entities, and their employees,	
		drug (intended for personal or	officers, directors, and agents;	
		household use) that was	D C 1	
		dispensed by Defendant CVS	Defendants' legal	
		Pharmacy, Inc. (including Target	representatives, assigns, and	
		locations), and manufactured,	successors;	
		distributed, or sold by any of the Manufacturer Defendants.	Individuals whose only	
		Wanufacturer Defendants.	Individuals whose only valsartan-containing drug	
			purchases (intended for	
			personal or household use),	
			who would otherwise meet this	
			Class Definition, were Hetero	
			Defendants' valsartan-	
			containing drugs dispensed by	
			CVS prior to May 1, 2018;	
			0 \ 2 pilot to 1\(\text{1a}\) 1, 2010,	
			All persons who properly	
			execute and file a timely	
			request for exclusion from any	
			Court-approved class.	
CVS Unjust	CVSUE2	All individuals in Alabama;	Id.	Mark Hays (CA); Jay Meader
Enrichment		California; Colorado; Indiana;		(CA);
Grouping		Montana, who, since at least		
No. 2		January 1, 2012, and through the		

		date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
CVS Unjust Enrichment Grouping No. 4	CVSUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Marzanna Glab (NJ); James Lawson (NJ); Larry Semmel (PA);
CVS Unjust Enrichment Grouping No. 5	CVSUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico;	Id.	Lawrence Edwards (GA); Marlin Anderson (IL); Sandy Bell (LA); Joseph Kessinger (KS); Veronica Longwell (MA)

CVS Unjust Enrichment Grouping No. 6	CVSUE6	New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and, Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants. All individuals in Delaware; Florida; Kentucky; Ohio who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS	Id.	Ron Molinaro (FL)
		dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the		
		Manufacturer Defendants.		
CVS Unjust Enrichment	CVSUE7	All individuals in Connecticut who, since at least January 1, 2012, and through the date of	Id.	Peter O'Brien (CT)

Grouping		final recall (as of November 10,		
No. 7		2021), paid any amount of		
NO. 7		1		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant CVS		
		Pharmacy, Inc. (including Target		
		locations), and manufactured,		
		distributed, or sold by any of the		
		Manufacturer Defendants.		
Walgreens	WALUE1	All individuals in Texas, who,	Any judge or magistrate	Eric Erwin (TX); Brittney Means
Unjust		since at least January 1, 2012,	presiding over this action, and	(TX)
Enrichment		and through the date of final	members of their families;	
Grouping		recall (as of November 10,		
No. 1		2021), paid any amount of	Defendants and affiliated	
		money for a valsartan-containing	entities, and their employees,	
		drug (intended for personal or	officers, directors, and agents;	
		household use) that was		
		dispensed by Defendant	Defendants' legal	
		Walgreens Co., and	representatives, assigns, and	
		manufactured, distributed, or	successors;	
		sold by any of the Manufacturer		
		Defendants.	Individuals whose only	
			valsartan-containing drug	
			purchases (intended for	
			personal or household use),	
			who would otherwise meet this	
			Class Definition, were Hetero	
			Defendants' valsartan-	
			containing drugs dispensed by	
			Walgreens prior to May 1,	
			2018;	
			2010,	

			All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walgreens Unjust Enrichment Grouping No. 4	WALUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Robin Roberts (VA); Radhakrishna Shetty (NJ)
Walgreens Unjust Enrichment Grouping No. 5	WALUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of	Id.	Lubertha Powell (GA); Marlin Anderson (IL); Billy Joe Bruner (NM); John Duffy (NY)

		money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walgreens Unjust Enrichment Grouping No. 6	WALUE6	All individuals in Delaware; Florida; Kentucky; Ohio, who, through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Estate of Elenora Deutenberg/Feijoo (FL);
Rite-Aid* Unjust Enrichment Grouping No. 5	RITUE5	All individuals in D.C.; Georgia; Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors;	Lawrence Edwards (GA); Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY)

Rite-Aid*	RITUE6	final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation*, and manufactured, distributed, or sold by any of the Manufacturer Defendants. All individuals in Delaware,	Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Rite-Aid* prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class. Id.	Dennis Kaplan (OH)
Unjust Enrichment Grouping		Florida, Kentucky, Ohio, who, since at least January 1, 2012, and through the date of final		
No. 6		recall (as of November 10,		
		2021), paid any amount of money for a valsartan-containing		
		drug (intended for personal or household use) that was		
		dispensed by Defendant Rite- Aid Corporation*, and		
		manufactured, distributed, or		
		sold by any of the Manufacturer Defendants.		
Walmart	WMTUE1	All individuals in Texas, who,	Any judge or magistrate	Samuel Cisneros (TX); Jyona
	WWITUEI	,		Gail Lee (TX); Jyona
Unjust Enrichment		since at least January 1, 2012,	presiding over this action, and	Gan Lee (1A),
Enrichment		and through the date of final	members of their families;	

Grouping No. 1		recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walmart (including Sam's Club locations) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart Unjust Enrichment Grouping No. 2	WMTUE2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a	Id.	Brian Wineinger (IN)

		valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walmart Unjust Enrichment Grouping No. 3	WMTUE3	All individuals in Arizona; Arkansas; Maryland; Minnesota; Rhode Island; Vermont; Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Walmart Unjust Enrichment Grouping No. 4	WMTUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid	Id.	Robin Roberts (VA)

		1 2	T	<u></u>
		any amount of money for a		
		valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		dispensed by Defendant		
		Walmart Stores, Inc. (including		
		Sam's Club locations), and		
		manufactured, distributed, or		
		sold by any of the Manufacturer		
		Defendants.		
Walmart	WMTUE5	All individuals in D.C.; Georgia;	Id.	Gary Burnett (NC); Flora
Unjust		Hawaii; Illinois; Iowa; Kansas;		McGilvery (MS); Talsie Neal
Enrichment		Louisiana; Maine;		(LA);
Grouping		Massachusetts; Mississippi;		
No. 5		Missouri; Nevada; New Mexico;		
		New York; North Carolina;		
		Oklahoma; Oregon; South		
		Carolina; South Dakota;		
		Tennessee; Utah; and Puerto		
		Rico, who, since at least January		
		1, 2012, and through the date of		
		final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant		
		Walmart Stores, Inc. (including		
		Sam's Club locations), and		
		manufactured, distributed, or		
		sold by any of the Manufacturer		
		Defendants.		

Express Scripts Unjust Enrichment Grouping No. 2	ESIUE2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Express Scripts prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class. Id.	Merilyn Andre (CA); Mark Hays (CA) Veronica Longwell (MA)
Scripts Unjust Enrichment	LOIOLO	Hawaii; Illinois; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico;	Tu.	veromea Longwen (19171)

Grouping		New York; North Carolina;		
No. 5		Oklahoma; Oregon; South		
		Carolina; South Dakota;		
		Tennessee; Utah; and Puerto		
		Rico, who, since at least January		
		1, 2012, and through the date of		
		final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant Express		
		Scripts, Inc., and manufactured,		
		distributed, or sold by any of the		
		Manufacturer Defendants.		
Kroger	KROUE2	All individuals in Alabama;	Any judge or magistrate	Leland Gildner (IN)
Unjust		California; Colorado; Indiana;	presiding over this action, and	
Enrichment		Montana, who, since at least	members of their families;	
Grouping		January 1, 2012, and through the		
No. 2		date of final recall (as of	Defendants and affiliated	
		November 10, 2021), paid any	entities, and their employees,	
		amount of money for a	officers, directors, and agents;	
		valsartan-containing drug		
		(intended for personal or	Defendants' legal	
		household use) that was	representatives, assigns, and	
		dispensed by Defendant The	successors;	
		Kroger, Co., and manufactured,	7 17 1 1 1 1	
		distributed, or sold by any of the	Individuals whose only	
		Manufacturer Defendants.	valsartan-containing drug	
			purchases (intended for	
			personal or household use), who would otherwise meet this	
			Class Definition, were Hetero	

			Defendants' valsartan- containing drugs dispensed by Kroger prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Optum Rx Unjust Enrichment Grouping No. 2	OPTUE2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by OptumRx prior to May 1, 2018;	Charlie Johnston (CA)

		All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Unjust Enrichment Grouping No. 2	All individuals in Alabama; California; Colorado; Indiana; Montana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Albertson's LLC (including Sav- On), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families; Defendants and affiliated entities, and their employees, officers, directors, and agents; Defendants' legal representatives, assigns, and successors; Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Albertson's (including Sav-On) prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Merilyn Andre (CA)

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Consumer Economic Loss Class Definitions and Exclusions Table

WHOLESALER DEFENDANTS

Wholesaler Defendants Unjust Enrichment Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Wholesaler	WHUE1	All individuals in Texas, who,	Any judge or magistrate	Eric Erwin (TX); Brittney Means
Defendants		since at least January 1, 2012, and	presiding over this action, and	(TX); Jynona Gail Lee (TX);
Unjust		through the date of final recall (as	members of their families;	Samuel Cisneros (TX)
Enrichment		of November 10, 2021), paid any		
State		amount of money for a valsartan-	Defendants and affiliated	
Grouping		containing drug (intended for	entities, and their employees,	
No. 1		personal or household use) that	officers, directors, and agents;	
		was distributed in whole or in part		
		by Defendants Cardinal Health,	Defendants' legal	
		Inc., McKesson Corporation,	representatives, assigns, and	
		and/or AmerisourceBergen	successors;	
		Corporation, and manufactured in		
		whole or in part by any of the	Individuals whose only	
		Manufacturer Defendants.	valsartan-containing drug	
			purchases (intended for	
			personal or household use),	
			who would otherwise meet this	
			Class Definition, were Hetero	
			Defendants' valsartan-	
			containing drugs dispensed	
			prior to May 1, 2018;	
			All nonconcervibe manager	
			All persons who properly	
			execute and file a timely request for exclusion from any	
			Court-approved class.	
Wholesaler	WHUE2	All individuals in Alabama;	Id.	Asha Lamy (AL); Sandra Kelly
Defendants	WITUEZ	•	Iu.	
Defendants		Connecticut; and Montana, who,		(AL); Peter O'Brien (CT)

Unjust Enrichment State Grouping No. 2		since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.		
Wholesaler Defendants Unjust Enrichment State Grouping No. 3	WHUE3	All individuals in Arizona; Arkansas; Maryland; Minnesota; Rhode Island; Vermont; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Wholesaler Defendants Unjust	WHUE4	All individuals in Alaska; Idaho; Nebraska; New Jersey; North Dakota; Pennsylvania; Virginia;	Id.	Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Radhakrishna

Enrichment		and Washington, who, since at		Shetty (NJ); Lawrence Semmel
State		least January 1, 2012, and through		(PA); Robin Roberts (VA); Mary
Grouping		the date of final recall (as of		McLean (VA); Cheryl Mullins
No. 4		November 10, 2021), paid any		(VA)
		amount of money for a valsartan-		(/
		containing drug (intended for		
		personal or household use) that		
		was distributed in whole or in part		
		by Defendants Cardinal Health,		
		Inc., McKesson Corporation,		
		and/or AmerisourceBergen		
		Corporation, and manufactured in		
		whole or in part by any of the		
		Manufacturer Defendants.		
Wholesaler	WHUE5	All individuals in D.C.; Georgia;	Id.	Lubertha Powell (GA); Marlin
Defendants		Hawaii; Illinois; Iowa; Kansas;		Anderson (IL); Joseph Kessinger
Unjust		Louisiana; Maine; Massachusetts;		(KS); Talsie Neal (LA); Sandy
Enrichment		Mississippi; Missouri; Nevada;		Bell (LA); Estate of Linda
State		New Mexico; New York; North		Crocker (ME); Veronica
Grouping		Carolina; Oklahoma; Oregon;		Longwell (MA); Flora McGilvery
No. 5		South Carolina; South Dakota;		(MS); Billy Joe Bruner (NM);
		Tennessee; Utah; and Puerto Rico,		Alphonse Borkowski (NY); John
		who, since at least January 1,		Duffy (NY); Gerald Nelson
		2012, and through the date of final		(NY); Joseph Cacaccio (NY);
		recall (as of November 10, 2021),		Gary Burnett (NC); Miranda
		paid any amount of money for a		Dudley (NC)
		valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		distributed in whole or in part by		
		Defendants Cardinal Health, Inc.,		
		McKesson Corporation, and/or		
		AmerisourceBergen Corporation,		

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		and manufactured in whole or in part by any of the Manufacturer Defendants.		
Wholesaler Defendants Unjust Enrichment State Grouping No. 6	WHUE6	All individuals in California; Colorado; Delaware; Florida; Indiana; Kentucky; and Ohio, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Id.	Jay Meader (CA); Mark Hays (CA); Merilyn Andre (CA); Charlie Johnston (CA); Ron Molinaro (FL); Estate of Elenora Deutenberg/Feijoo (FL); Brian Wineinger (IN); Leland Gildner (IN); Glenda Cooper (KY); Dennis Kaplan (OH)